

1 Mark Rumold (SBN 279060)  
2 901 Cortland Ave. Apt B  
3 San Francisco, CA 94110  
(415)694-1639  
mark.rumold@gmail.com

4 Attorney for Plaintiff  
William Pickard  
5

6 MELINDA HAAG (CSBN 132612)  
United States Attorney  
7 JOANN M. SWANSON (CSBN 88143)  
Chief, Civil Division  
8 NEILL T. TSENG (CSBN 220348)  
Assistant United States Attorney  
9

10 450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7155  
11 FAX: (415) 436-6927  
neill.tseng@usdoj.gov

12 Attorneys for Defendant  
13 UNITED STATES DEPARTMENT OF JUSTICE

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN FRANCISCO DIVISION

17 WILLIAM PICKARD, ) C 06-00185 CRB  
18 Plaintiff, )  
19 v. ) **SECOND STIPULATION RE  
20 UNITED STATES DEPARTMENT OF SUMMARY JUDGMENT BRIEFING  
JUSTICE, ) SCHEDULE; [PROPOSED] ORDER**  
21 Defendant. )  
22

23 Subject to the approval of the Court, the parties hereby stipulate as follows:

24 The Court previously entered a stipulated order changing the summary judgment briefing  
25 schedule based on the absence from office due to medical reasons of DEA attorney William  
26 Little, who is the agency counsel in this case and the declarant supporting defendant's third  
27 motion for summary judgment. Mr. Little originally anticipated returning to work on June 25,  
28 2012. However, defendant's counsel, who was himself out of office from June 26, 2012, until

SECOND STIP. RE SUMMARY JUDGMENT BRIEFING SCHEDULE; [PROPOSED] ORDER  
C 06-00185 CRB

1 July 5, 2012, was informed by Mr. Little on July 10, 2012, that Mr. Little had been unable to  
2 work for the past three weeks due to medical reasons and had returned to the office on July 9,  
3 2012.

4 Defendant anticipates filing a supplemental declaration by Mr. Little in support of  
5 defendant's opposition to plaintiff's cross-motion for summary judgment/reply in support of  
6 defendant's third motion for summary judgment. Given Mr. Little's unforeseen extended  
7 absence from work, however, defendant is unable to prepare and file that supplemental  
8 declaration or the associated opposition/reply brief by the current deadline of July 13, 2012.  
9 Accordingly, at defendant's request, the parties have stipulated to modify the remainder of the  
10 summary judgment briefing schedule and hearing date as follows:

11 July 23, 2012: Deadline for filing defendant's reply brief and opposition to plaintiff's  
12 cross-motion for summary judgment

13 August 20, 2012: Deadline for filing plaintiff's reply brief

14 September <sup>28</sup>~~24~~, 2012: Hearing on parties' cross-motions for summary judgment

16 DATED: July 11, 2012

17 By: /s/ Mark Rumold  
MARK RUMOLD  
18 Attorney for Plaintiff

19 MELINDA HAAG  
United States Attorney

21 DATED: July 11, 2012

22 By: Neill  
NEILL T. TSENG  
23 Assistant United States Attorney  
Attorneys for Defendant

24 PURSUANT TO STIPULATION, IT IS SO ORDERED:

27 DATED: July 12, 2012



SECOND STIP. RE SUMMARY JUDGMENT BRIEFING SCHEDULE; [PROPOSED] ORDER  
C 06-00185 CRB